



# National Leadership Grants for Libraries Phase One Reviewer Handbook

Office of Library Services  
Fiscal Year 2023

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## Welcome

Thank you for agreeing to serve as a peer reviewer for this year's National Leadership Grants for Libraries program. We hope you will find this a rewarding experience and will draw satisfaction identifying projects that will enhance the quality of library and archival services nationwide by advancing theory and practice. We assure you that your contribution of time and expertise will be invaluable to IMLS and to the applicants who will receive your comments.

In this handbook, you will find the information you need to carry out your review, including information about the program, instructions for using eGMS Reach, and important reference material.

If you have any questions about this material or the processes described, please do not hesitate to contact your panel chair at any time.

Once again, thank you for the service you are about to render to libraries and communities throughout the nation.

IMLS Office of Library Services Staff

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# Application Proposal & Review Process

Below is a summary of the process from application proposal submission through award announcements.

## Phase One

1. Applicants submit preliminary proposals to IMLS.
2. IMLS checks the preliminary proposals for eligibility and completeness.
3. IMLS identifies available reviewers with appropriate expertise and assigns reviewers to evaluate each preliminary proposal.
4. Preliminary proposal reviewers receive access to the proposals, evaluate them, and complete their comments and scores in the eGMS Reach system.
5. IMLS convenes preliminary proposal review panels for reviewers to discuss the scores and merits of the proposals.
6. IMLS staff aggregate reviewer comments and scores and make invitation decisions.
7. IMLS invites select applicants to submit full proposals. Whether or not they are invited to submit a full proposal, all applicants receive anonymized copies of their peer review comments and scores.

## Phase Two

8. Invited applicants submit full proposals to IMLS.
9. IMLS checks the full proposals for eligibility and completeness.
10. IMLS identifies available reviewers with appropriate expertise and assigns reviewers to evaluate each full proposal.
11. Full proposal reviewers receive access to the proposals, evaluate them, and complete their comments and scores in the eGMS Reach system.
12. IMLS staff members may hold phone calls with reviewers to discuss scores and the merits of the proposals, as needed.
13. IMLS staff members review the financial information of each potential grant and grantee, including a detailed check of the proposed budget.
14. Based on reviewer comments and scores, IMLS staff members recommend proposals for funding to the IMLS Director, who has the authority to make final funding decisions.
15. The IMLS Director makes all final funding decisions.
16. IMLS notifies all applicants whether they have received an award or not. With their notifications, all applicants receive anonymous copies of their reviews. IMLS sends notification of the awards to each participating reviewer.

## Review Process

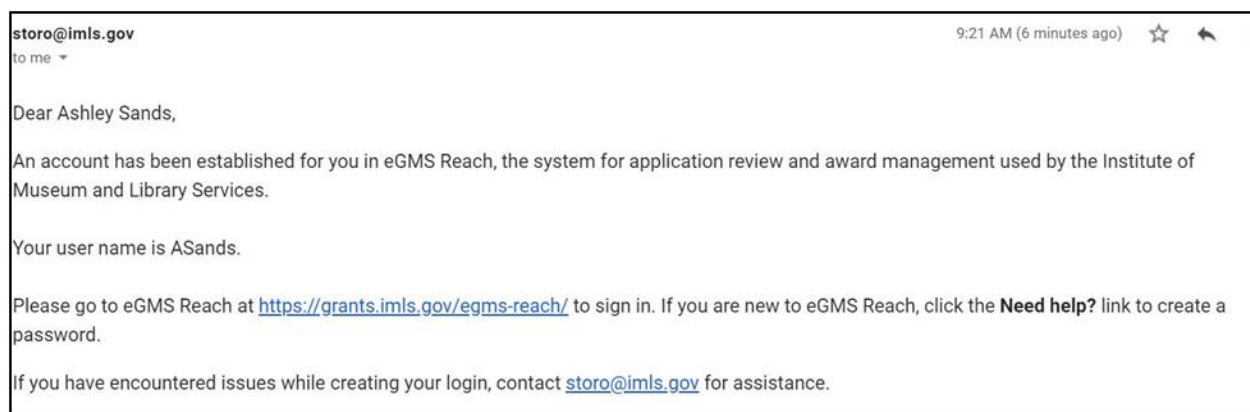
### IMLS Completeness and Eligibility Review

IMLS staff review the eligibility and completeness of applications before distributing them for peer review

### Access to online portal


All review materials will be provided to you via the IMLS application review and grants management system maintained by IMLS. This system is called “eGMS Reach.” It is both the online portal that you will use to receive materials for review and the system where you will input your reviews.

To access the online portal for the first time, you will receive a separate email (see example below) from IMLS prompting you to create a username and password. If you do not receive the email, please check your junk folder. If you still do not see the message, contact [imls-librarygrants@imls.gov](mailto:imls-librarygrants@imls.gov). The email body will include instructions for how to setup your password on your first login.



Please alert IMLS staff immediately if you have not received your access credentials, if any materials are missing, if you cannot open them, or if you encounter any other issues.

Upon receipt of the email, you should log into eGMS Reach—the system for application review and grants management used by IMLS. After you have completed the successful login, please ensure that you can access your reviewer materials. To do this, click on the “Go to Panel” button for your panel. Your panel will have a name that begins with “FY23\_NLG.”

My Panels	
	Name
 Go to Panel LG-OLS-22-17886	FY22_NLG_SVCS_PR_2

The Panel section of eGMS Reach will provide you with the information you need to perform and submit your reviews. It begins with IMLS contact information for the panel, followed by your reviewer materials, and then it includes the applications you will be reviewing.

Your review process consists of three main activities:

1. Preparing to begin peer review by reading available documentation:
  - Quick Reference Guide
  - Reviewer Handbook (this document)
  - Notice of Funding Opportunity
2. Confirming no Conflicts of Interest  
(you must check this box before accessing the proposals)
3. Reading and reviewing the applications

Using the online portal eGMS Reach, you will complete an evaluation form that includes written comments and asks you to assign one “Grade” or score for each application. More guidance on evaluating applications is provided in this document, but if any application seems to be missing pages or other information, please contact [imls-librarygrants@imls.gov](mailto:imls-librarygrants@imls.gov).

## Conflict of Interest Statement

Before proceeding to the Applications Tab, you must affirm that you have reviewed and approved the conflict of interest statement located under your Personal Files and in the Complying with Ethical Obligations and Avoiding Conflicts of Interest section of this document. Click on the paper icon to review Complying with Ethical Obligations and Avoiding Conflicts of Interest. Then click on the pen icon to affirm that you have reviewed this file and approved its contents.

Once you begin reviewing your assigned proposals, you may identify other conflicts. **Contact your Panel Chair immediately if you identify any potential conflicts of interest.**

## Confidentiality

The information contained in grant proposals is strictly confidential. Do not discuss or reveal names, institutions, project activities, or any other information contained in the proposals. Contact IMLS if you have any questions concerning a proposal. **Do not contact applicants directly or post on social media about your involvement in the process.**

## Managing records

Keep the proposals, a copy of your reviews, and any notes about the proposals in case there are questions from IMLS staff. Please destroy your review materials after awards are made.

## Glossary of terms

At times the vocabulary used on the IMLS grants management portal, eGMS Reach, does not completely match the common IMLS vocabulary. We may use terms interchangeably throughout our instructions and in the online eGMS Reach interface. Here is a breakdown of common terms you will come across while completing your review:

- **Panel:** The online space in which you will be completing the review process
- **Coordinator:** IMLS Staff member available for technical questions you may have
- **Chair:** IMLS staff member available for content-based questions you may have
- **Evaluation:** Your reviewer comments and feedback that are provided to applicants
- **Applications:** Proposals from applicants that you will be reviewing
- **Application Number:** The unique identifier assigned to each proposal

- **Primary Person/Individual:** Project Director (PD) or Principal Investigator (PI)
- **Primary Institution:** The lead applicant and fiscal agent for a project
- **Grade:** The single score or number you will provide for each proposal.

## Reading proposals

Your thorough reading and understanding of each proposal will be key to providing insightful comments aligned with your overall grade or score for the proposal. Before you review the proposals, please ensure you are familiar with the program Notice of Funding Opportunity (which can be found on our website, is linked below, and is available in your eGMS Reach portal) and reference it as needed throughout the review process.

Please review the [NLG Notice of Funding Opportunity \(NOFO\) for FY23 \(PDF\)](#).

We estimate that it may take up to an hour to evaluate one proposal. First time reviewers may require additional time.

## Writing comments

As you are typing your reviews into Reach:

- Please do not have more than one of the review forms open at the same time. The autosave will NOT work and you will lose your information.
- We recommend saving frequently to avoid losing any of your work.
- Please also use the Plain text feature for pasting or editing your comments

Write comments of 3-5 sentences minimum for each of the following review questions:

1. **Project Justification:** How well does the proposal align with the intent of the grant program as articulated in the program's goals and objectives (see Section A2 of the [NOFO](#))? How well does it address current nationally significant needs, challenges, or opportunities in the field?
2. **Project Work Plan:** What elements are in place and what elements are missing for successful execution of the proposed project? What recommendations do you have for improving the proposal?
3. **Results and Impact:** Considering the topic, project type selection, amount of funds requested, and scope of potential impact, should the applicant be invited to submit a full proposal at this time? Why or why not?

Reviewer comments are used by IMLS staff to inform invitation decisions. They are also provided to both successful and unsuccessful applicants to help improve their projects or future proposals.

When drafting your comments:

- Present comments in a constructive and professional manner to help the applicant improve their proposal. Keep in mind that applicants were limited to 2 pages for their preliminary proposals.
- Analyze the proposal in your comments. Summarizing or paraphrasing the applicant's own words will not help the applicant.
- Use your professional knowledge and experience to assess the information objectively.

- Comments should be addressed to the applicants, not IMLS staff.
- Make sure your comments justify the scores you provide. A highly complementary comment does not remove the sting of a low score, and a negative comment does not even out a high one. Comments and scores must complement each other and make sense as a whole.

Characteristics of effective comments:	Characteristics of poor comments:
<ul style="list-style-type: none"> <li>• Presented in a constructive manner</li> <li>• Concise, easy to read and understand</li> <li>• Specific to the individual proposal</li> <li>• Reflect your experience and expertise</li> <li>• Correlate with the given score</li> <li>• Reflect the proposal's strengths and identify areas for improvement</li> <li>• Based on the NOFO criteria</li> </ul>	<ul style="list-style-type: none"> <li>• Make derogatory remarks</li> <li>• Question an applicant's honesty or integrity</li> <li>• Offer or ask for irrelevant or extraneous information</li> <li>• Offer limited explanation or detail</li> <li>• Reflect personal biases or impact reviewer anonymity</li> </ul>

Below are some examples of **effective** reviewer comments:

How well does the proposal address the goals and objectives of the grant program?	
<p>"With the partnerships in place and the national-level need for preserving private and sensitive content, this project addresses the goals and objectives of the grant program. The authors of the proposal plan to include experts in the field and support personnel as well as librarians or archivists as partners in the planning and execution of the project. They also demonstrate expertise in the subject and plan to collaborate to fill any gaps in their current knowledge. Many universities experience this need and work towards resolving it will certainly support the filling of gaps in our national digital infrastructure. More stable preservation of this sensitive material will serve the population at large by making health and related data more securely preserved (both from loss and from exposure)."</p>	<p><i>Comment is substantive, addresses the review criteria, and employs a positive tone.</i></p>
<p>"You make a strong case for the library to partner with the University to provide research expertise and the results clearly meet the needs of your target audience. However, I believe that the problem you identify is one based in your community rather than in the library field and does not meet the NLG-Library program goals of demonstrating national impact or using an innovative approach. Consider applying to opportunities with your state library or a local foundation."</p>	<p><i>Comment correlates with the score of 1 and makes implementable suggestions for seeking other funding.</i></p>
What elements are in place and what elements are missing for successful execution of the proposed project? What recommendations do you have for improving the proposal?	
<p>"The partnerships outlined in the proposal will be very important to the successful completion of the project. I would recommend connecting with more office of research personnel especially those involved in the Data Use Agreement workflows of their universities. Planning to contract with and pay experts assures me that you understand that this project cannot be successful without these perspectives."</p>	<p><i>Comment provides a constructive assessment of the application and specific suggestions the applicant could implement.</i></p>



Considering the topic, project type selection, amount of funds requested, and scope of potential impact, should the applicant be invited to submit a full proposal at this time? Why or why not?	
“I do recommend this proposal be invited to submit a full proposal. I think that it’s an important area of growth for academic libraries. I also think that this is good to fund as a planning grant, because it could become a project to actively resolve the gaps by using the report and other findings from this work. In the full proposal, please make sure you clearly explain how this project is distinct from other projects funded in this area. Please also clearly explain how this project is taking lessons from previous projects to move the field forward.”	<i>Comment addresses questions from the review criteria and includes detail on a specific topic the reviewer would need to see in a full proposal.</i>

In contrast, below are some examples of **poor** reviewer comments:

How well does the proposal address the goals and objectives of the grant program?	
“The library plans to organize a series of experimental interactive education programs on the topic of income equity and evaluate them to determine which prove most successful in meeting their desired learning outcomes for their high school participants. They will share the results on a website.”	<i>Comment paraphrases the applicant’s own words.</i>
What elements are in place and what elements are missing for successful execution of the proposed project? What recommendations do you have for improving the proposal?	
“The work plan would be improved by putting in more time onsite.”	<i>Comment is very brief and has little value to the applicant.</i>
Considering the topic, project type selection, amount of funds requested, and scope of potential impact, should the applicant be invited to submit a full proposal at this time? Why or why not?	
“The design of this research study is wrong-headed and will not yield any useful data. The staff is woefully unprepared and will fail in the execution of this project. Targeting federal funds to this project is a mistake.”	<i>Comment is derogatory and does not provide useful feedback.</i>
“Strong results with very sustainable benefits.”	<i>Comment is very brief and has little value to the applicant.</i>

## Assigning scores

After you have read, evaluated, and written comments for each proposal, please provide a single numeric grade or score from 1-5 (5 being the highest) that reflects your opinion of the proposal’s overall quality and your recommendation of whether it should be invited. A score of 3 or above is typically considered “invite-able.” (See the Guidance for Assigning Scores below for more information.)

To help applicants understand and benefit from your reviews, make sure that your scores accurately reflect your written comments. There is no “submit” button for reviews in the eGMS Reach system and your reviews will automatically save as you work. Once you are finished with all your reviews, please email your assigned Panel Chair and let them know.

## Guidance for Assigning Scores

Invite-able	Excellent	5	The proposal <i>exemplifies</i> a goal and objective of the grant program, has <i>all</i> the elements in place for successful execution of the proposed project, and is designed to ensure national impact (as described in the <a href="#">Notice of Funding Opportunity</a> ). <u>You recommend inviting a full proposal without reservation.</u>
	Very Good	4	The proposal <i>mostly</i> demonstrates a goal and objective of the grant program, has <i>most</i> of the elements in place for successful execution of the proposed project, and is designed to ensure national impact. <u>You recommend inviting a full proposal.</u>
	Good	3	The proposal <i>somewhat</i> demonstrates a goal and objective of the grant program, has <i>some</i> of the elements in place for successful execution of the proposed project, and is designed to ensure national impact. <u>You recommend inviting a full proposal but acknowledge it could be more successful with some changes.</u>
Do not invite	Some Merit	2	The proposal <i>does not</i> demonstrate a goal and objective of the grant program, has <i>few</i> of the elements in place for successful execution of the proposed project, and/or is not designed to ensure national impact. <u>You do not recommend inviting a full proposal but think the proposal could be strengthened for resubmission in a future grant</u>
	Inadequate	1	The proposal <i>does not</i> demonstrate a goal and objective of the grant program, has <i>few</i> of the elements in place for successful execution of the proposed project, and is not designed to ensure national impact. <u>You do not recommend inviting a full proposal or resubmission.</u>

## Review Panels

When the panel convenes, we will discuss each proposal. While our time is limited, we should be able to go over every proposal in sufficient detail. We do not need to reach consensus on any proposal, but **you will have the opportunity to adjust your scores and add to or revise your comments after each proposal is discussed.** You must finalize scores and comments before the end of the panel.

For all questions about reviewing, either technical or programmatic, contact IMLS staff.

## Purpose & Scope of National Leadership Grants for Libraries

The National Leadership Grants for Libraries (NLG-L) support projects of *national impact* that *address critical needs* of the library and archives fields and have the *potential to advance practice nationally* in these professions to strengthen library and archival services for the American public.

Projects are expected to:

- propose far-reaching impact to influence practice across one or more disciplines within the libraries and archives fields;
- reflect a thorough understanding of current practice, knowledge about the subject matter, and an awareness of and support for current strategic priorities in the field;
- use collaboration to demonstrate broad need, field-wide buy-in and input, and access to appropriate expertise; and
- generate results such as new models, new tools, research findings, services, practices, and/or alliances that can be widely used, adapted, scaled, or replicated to extend and leverage the benefits of federal investment.

### IMLS agency-level goals and objectives

The mission of the Institute of Museum and Library Services (IMLS) is to advance, support, and empower America's museums, libraries, and related organizations through grantmaking, research, and policy development. Guiding our grantmaking are three agency-level goals with two objectives each.

- Goal 1: Champion Lifelong Learning
  - Objective 1.1: Advance shared knowledge and learning opportunities for all.
  - Objective 1.2: Support the training and professional development of the museum and library workforce.
- Goal 2: Strengthen Community Engagement
  - Objective 2.1: Promote inclusive engagement across diverse audiences.
  - Objective 2.2: Support community collaboration and foster civic discourse.
- Goal 3: Advance Collections Stewardship and Access
  - Objective 3.1: Support collections care and management.
  - Objective 3.2: Promote access to museum and library collections.

The National Leadership Grants for Libraries Program is designed to support the achievement of these agency-level goals and to facilitate the delivery of significant results.

Throughout its work, IMLS places importance on diversity, equity, and inclusion. This may be reflected in an IMLS-funded project in a wide range of ways, including efforts to serve individuals of diverse geographic, cultural, and socioeconomic backgrounds; individuals with disabilities; individuals with limited functional literacy or information skills; individuals having difficulty using a library or museum; and underserved urban and rural communities, including children from families with incomes below the poverty line.

This may also be reflected in efforts to recruit and develop future professionals in the library or museum fields (e.g., paid internships), develop strategies for building or enhancing access to collections and information, and compensate project participants (e.g., students, staff, community members, advisors) as appropriate for their time and expertise.

### NLG-L program-level goals and objectives

Each applicant should align their proposed project with one of these program goals and one or more of the associated objectives. Please note the goals are not numbered in order of priority.

The goals for this program are to generate projects of *national impact* that:

**Goal 1:** Build the workforce and institutional capacity for managing the national information infrastructure and serving the information and education needs of the public.

- Objective 1.1: Develop or enhance replicable library and archives programs, models, and tools that provide opportunities to support all types of learning. Topics addressed may include, but are not limited to, informal STEM or other types of participatory learning; community or citizen science; community and expert narratives; early learning; workforce development; and digital, information, health, financial, media, civic, and other types of literacies.
- Objective 1.2: Collaborate with formal and/or informal learning organizations to incorporate promising practices from allied domains into library and archives services. Partners may include, but are not limited to, museums, school systems, universities, extension programs, youth-serving organizations, departments of correction, and workforce or economic development organizations.
- Objective 1.3: Create and/or facilitate opportunities for continuous learning for families, groups, and individuals of diverse cultural and socioeconomic backgrounds and needs including, but not limited to, young children and their caregivers, tweens and teens, un- and under-employed adults looking to make career transitions or reenter the workforce, veterans, immigrants and refugees, individuals with disabilities, English-language learners, and senior citizens.

**Goal 2:** Build the capacity of libraries and archives to lead and contribute to efforts that improve community well-being and strengthen civic engagement.

- Objective 2.1: Develop or enhance replicable library programming, models, and tools that engage communities and individuals of diverse cultural and socioeconomic backgrounds. Topics may include, but are not limited to, workforce and development; financial, health, social, or legal services; or efforts that increase equity and access.
- Objective 2.2: Develop or enhance collaborations between libraries and stakeholders, and leverage opportunities to address community needs. Partners may include, but are not limited to, museums, school systems, service organizations, workforce or community development groups, government agencies, departments of correction, community colleges, and community associations.
- Objective 2.3: Establish or refine approaches that equip libraries and archives to contribute to the well-being of communities. Approaches may include, but are not limited to, asset mapping, public data mining, social network analysis, journey mapping, and generating impact indicators in collaboration with the community to better understand social and economic conditions, infrastructure challenges, and geographic or cultural barriers.

**Goal 3:** Improve the ability of libraries and archives to provide broad access to and use of information and collections with emphasis on collaboration to avoid duplication and maximize reach.

- Objective 3.1: Advance digital inclusion, broadly defined. Approaches may include, but are not limited to, enhancing digital infrastructures, platforms, technologies, online services, connectivity, digital literacy, privacy, and security, as well as creating new processes and procedures needed to sustain a robust online environment.
- Objective 3.2: Support innovative approaches to digital collection management including, but

not limited to, preservation and access to information and resources through retrospective and born-digital content; digital preservation strategies; community archives; web archiving; and improving cataloging and inventory practices.

- Objective 3.3: Support the design and development of online library and archives services that meet user expectations for operating in an online environment.

**Goal 4:** Strengthen the ability of libraries to provide services to affected communities in the event of an emergency or disaster.

- Objective 4.1. Support the development of model national, regional, statewide, or local emergency and disaster management plans employing new and emerging technologies, where appropriate, and the widespread dissemination of information derived from them.
- Objective 4.2. Support the implementation of such emergency and disaster management plans or otherwise enable libraries to provide appropriate services to affected communities in the event of emergencies or disasters.

**Goal 5:** Strengthen the ability of libraries, archives, and museums to work collaboratively for the benefit of the communities they serve.

- Objective 5.1. Support the development of replicable systems that leverage institutional expertise and experience to maximize public access to and use of knowledge resources. Issues addressed may include, but are not limited to, practicing effective communication and conflict resolution, sharing decision-making, recognizing and accommodating different values, building a collective set of goals, establishing shared vocabularies and common practices, formalizing workflow processes or protocols, establishing guidelines and standards, building broad infrastructures, creating or customizing project technology, and cross-training staff and volunteers.
- Objective 5.2. Support joint projects designed to address a shared problem and structured to use the expertise, experience, and perspective of each partner institution in its solution. Collaborating partners should include at least one museum, broadly defined. Projects may address, but are not limited to, innovative programming; literacy skill-building; object- and primary source-based learning through exhibitions and programs; curriculum development; collections management, care, and conservation; enhancing online discoverability; and improving online user experience.

## Project Types

The project types are:

- Planning
- Forum
- Implementation
- Applied Research

Applicants must designate one of these project types.

**Planning projects** support exploratory activities, such as analyzing needs and feasibility; solidifying partnerships; developing project work plans; or developing prototypes, proofs of concept, and pilot studies. Applications should identify planning activities that have the potential to lead to future implementation. The period of performance for a Planning project is one to two years.

**Forum projects** support convening qualified experts and key stakeholders, including those from adjacent fields as appropriate, to help explore current or emerging issues or opportunities that are important to libraries and archives across the nation. Reports and other deliverables should be prepared for wide dissemination. Convenings should leverage technology, such as virtual meetings or live streaming, to allow broad participation. Additional mechanisms for engaging stakeholders and building awareness of the findings are encouraged. The period of performance for a Forum project is one to two years.

**Implementation projects** support the development, execution, and evaluation of work that transforms how libraries and archives serve the nation. Implementation projects may develop new tools and resources or expand existing products or services for new audiences or in new contexts. Applicants should design their proposed work to ensure that new practices have the potential to be easily adoptable, sustainable, and widely implementable across the field. The period of performance for an Implementation project is one to three years.

**Applied Research projects** support the investigation of key questions relevant to library or archival tools and services, building on prior empirical, theoretical, or exploratory work in libraries and archives or other relevant disciplines. Applicants *must* include clearly articulated research questions and feature appropriate methods, including relevant theoretical or conceptual approaches, data collection, and analysis. Findings and their implications for library and archival practice should be shared broadly throughout the grant period of performance, rather than exclusively at the end of the project. Dissemination activities should extend beyond publishing journal articles and presenting at academic conferences. Research projects should not be designed with a deterministic agenda or predetermined outcomes. Proposals focused on evaluation are *not* appropriate for the Applied Research project category and should be submitted under the Implementation project category above. The period of performance for an Applied Research project is one to three years.

## Guidance for Research Applications

A research application should answer the following questions in the project Narrative.

1. What are the research questions, methods, and theoretical framing?
2. What is the relevance of the proposed research for current practice?
3. What type of data will the PI gather?
4. How will the PI collect, analyze, and use the data?
5. Does the study require Institutional Review Board (IRB) approval? If so, what steps will be taken to secure IRB approval?
6. How will the PI report and disseminate findings?

## Complying with Ethical Obligations & Avoiding Conflicts of Interest

As a reviewer for IMLS, you perform a vital role in ensuring the integrity of IMLS's peer review process and must carry out your duties in accordance with government ethics rules. Before you evaluate applications, we ask that you review the following ***General Principles of Ethical Conduct*** and ***Summary of the Conflict of Interest Laws***. You will be asked to certify compliance with the IMLS Reviewer Conflict of Interest Statement and Certification. IMLS allocates up to one hour of your

reviewer time for you to consider these materials.

If, at any time in the course of performing your duties at IMLS, you believe you may have a conflict of interest, please contact the IMLS staff member coordinating your review process. Other questions about the ethics rules and responsibilities may be directed to IMLS's Designated Agency Ethics Official at [ethics@imls.gov](mailto:ethics@imls.gov); (202) 653-4787; 955 L'Enfant Plaza, SW, Suite 4000, Washington, DC 20024.

## General Principles of Ethical Conduct

1. Public service is a public trust, requiring you to place loyalty to the Constitution, the laws, and ethical principles above private gain.
2. You shall not hold financial interests that conflict with the conscientious performance of duty.
3. You shall not engage in financial transactions using nonpublic Government information or allow the improper use of such information to further any private interest.
4. You shall not, except pursuant to such reasonable exceptions as are provided by regulation, solicit or accept any gift or other item of monetary value from any person or entity seeking official action from, doing business with, or conducting activities regulated by IMLS, or whose interests may be substantially affected by the performance or nonperformance of your duties.
5. You shall put forth honest effort in the performance of your duties.
6. You shall make no unauthorized commitments or promises of any kind purporting to bind the Government.
7. You shall not use public office for private gain.
8. You shall act impartially and not give preferential treatment to any private organization or individual.
9. You shall protect and conserve Federal property and shall not use it for other than authorized activities.
10. You shall not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official Government duties and responsibilities.
11. You shall disclose waste, fraud, abuse, and corruption to appropriate authorities.
12. You shall satisfy in good faith your obligations as citizens, including all just financial obligations, especially those—such as Federal, State, or local taxes—that are imposed by law.
13. You shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, color, religion, sex, national origin, age, or handicap.
14. You shall endeavor to avoid any actions creating the appearance that you are violating the law or the ethical standards.



## Summary of Conflict of Interest Laws

**18 U.S.C. § 201** Prohibits you from acceptance of bribes or gratuities to influence Government actions.

**18 U.S.C. § 203** Prohibits you from accepting compensation for representational activities involving certain matters in which the United States is a party or has a direct and substantial interest.

**18 U.S.C. § 205** Prohibits you from certain involvement in claims against the United States or representing another before the Government in matters in which the United States is a party or has a direct and substantial interest.

**18 U.S.C. § 207** Imposes certain restrictions on you related to your activities after Government service.

**18 U.S.C. § 208** Prohibits you from participating in certain Government matters affecting your own financial interests or the interests of your spouse, minor child, general partner, or organization in which you are serving as an officer, director, trustee, general partner, or employee.

**18 U.S.C. § 209** Prohibits you from being paid by someone other than the United States for doing their official Government duties.

## Reviewer Conflict of Interest Statement

As a reviewer or panelist for IMLS, you may receive a grant application for review that could present a conflict of interest. Such a conflict could arise if you are involved with the applicant institution, or in the project described in the application, as a paid consultant or through other financial involvement. The same restrictions apply if your spouse or minor child is involved with the applicant institution or if the application is presented on behalf of an institution with which you, your spouse or minor child is negotiating for future employment.

A present financial interest is not the only basis for conflict of interest. Through prior association as an employee or officer, you may have gained knowledge of the applicant that would preclude objective review of its application. Past employment (generally more than five years) does not by itself disqualify a reviewer so long as the circumstances of your association permit you to perform an objective review of the application. If you believe you may have a conflict of interest with any application assigned to you for review, please notify us immediately.

You may still serve as a reviewer even if your institution is an applicant in this grant cycle or you were involved in an application submitted in this grant cycle, as long as you do not review any application submitted by your own institution or any application in which you were involved.

However, if you believe that these or any other existing circumstances may compromise your objectivity as a reviewer, please notify us immediately.

If an application presents no conflict of interest at the time you review it, a conflict of interest may still develop later on. Once you have reviewed an application, you should never represent the applicant in dealings with IMLS or another Federal agency concerning the application, or any grant that may result from it.

It is not appropriate, for your purposes or for the purposes of the institutions or organizations you represent, for you to make specific use of confidential information derived from individual applications that you read while you were serving as an IMLS reviewer. In addition, pending



applications are confidential. Accordingly, you must obtain approval from IMLS before sharing any proposal information with anyone, whether for the purpose of obtaining expert advice on technical aspects of an application or for any reason.

If you have any questions regarding conflict of interest, either in relation to a specific application or in general, please contact the IMLS staff member who is coordinating the review process.

## Protecting Sensitive Data at IMLS

IMLS is committed to protecting your private, sensitive information and employs the following physical and technical safeguards when collecting reviewer and panelist information:

1. **Email Security.** IMLS email is hosted on a cloud computing infrastructure which has been reviewed and approved as meeting the security requirements of the Federal Risk and Authorization Management Program (FedRAMP). FedRAMP is a government-wide standardized program for security assessment, authorization, and monitoring of cloud products and services. FedRAMP requirements are based on (and surpass) the Security and Privacy Controls for Federal Information Systems and Organizations developed by the National Institute of Standards and Technology. FedRAMP's additional security controls address the unique elements of cloud computing to ensure all federal data is secure in cloud environments.
2. **Secure File Transmission.** IMLS Secure File Upload uses Hypertext Transfer Protocol Secure (HTTPS), a transmission protocol that verifies the identity of a website or web service for a connecting client and encrypts nearly all information sent between the website or service and the user. HTTPS is designed to prevent this information from being read or changed while in transit. HTTPS is a combination of HTTP and Transport Layer Security (TLS). TLS is a network protocol that establishes an encrypted connection to an authenticated peer over an untrusted network.
3. **Secure File Storage.** IMLS will only store secure files and any related passwords as long as necessary to complete the relevant transaction or process. A physical copy of personally identifiable information (PII) may be printed at IMLS for business use, after which the copy is secured in a locked location and destroyed after the business use ceases.
4. **Access Controls.** IMLS employs access controls to restrict access to sensitive information that is stored electronically. Access to IMLS files is restricted to authorized IMLS staff, and sensitive data is stored in folders that can only be accessed by a restricted set of authorized users. Files containing sensitive information are password-protected, providing an additional layer of security.
5. **Records Policies.** IMLS financial transaction records are subject to the agency's record retention policy and disposed of in accordance with the General Services Administration's General Records Schedule.